

Your response

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Question 1: Do you agree with our proposed set of 88 high density areas for 6 GHz authorisation? If you disagree, please provide your reasoning and evidence.	Confidential? –N Wi-Fi Alliance supports Ofcom's objective of identifying high-density areas where additional mobile spectrum may be required in the future. We agree that limiting mobile authorizations to specific geographic areas represents a proportionate approach that balances future mobile requirements with continued spectrum availability for other users. We encourage Ofcom to ensure that the designated high-density areas are limited to those locations where there is clear evidence that additional mobile capacity is likely to be required. Geographic designations should remain as targeted as practicable to avoid unnecessarily constraining other authorized uses of the Upper 6 GHz band outside the areas where mobile deployment is expected. We also encourage Ofcom to periodically review the list of designated areas to ensure that it continues to reflect actual deployment needs and evolving population and traffic patterns.
Question 2: Do you agree with our proposal to clear fixed links from the Upper 6 GHz band in and around high-density areas, and to leave the band open to new fixed link licence applications outside of high-density areas, subject to coordination?	Confidential? –N Wi-Fi Alliance generally supports Ofcom's proposal to clear fixed links from the Upper 6 GHz band within designated high-density areas while allowing continued licensing outside those areas subject to coordination. This approach appropriately supports the future introduction of mobile services where spectrum demand is expected while minimizing unnecessary disruption to existing users outside the designated areas. We encourage Ofcom to ensure that the transition process remains predictable and transparent, with sufficient notice to affected licensees, and that spectrum outside high-density areas continues to be used efficiently through appropriate coordination mechanisms.

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Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	Wi-Fi Alliance has no comments.
Question 4: Do you agree with our proposal to remove access to the frequencies 7110–7125 MHz for PMSE use, but to retain the option of allowing users to “borrow” spectrum from the Upper 6 GHz band for occasional major events?	Wi-Fi Alliance has no comments.
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	Confidential? –N Wi-Fi Alliance supports appropriate protection for Radio Astronomy Service operations consistent with established international regulatory obligations. At the same time, protection measures should be technically justified, proportionate, and based on realistic deployment assumptions so that they do not unnecessarily constrain deployment of other services in the band. We encourage Ofcom to continue relying on established technical studies and internationally recognized methodologies when defining protection requirements.
Question 6: Do you have any comments on how we should manage co-existence between mobile and any other users in the Upper 6 GHz band (i.e., RAS, EESS, SRDs, FSS and MOD use)?	Confidential? –N Wi-Fi Alliance supports Ofcom's continued reliance on evidence-based coexistence studies and proportionate technical rules to enable efficient sharing of the Upper 6 GHz band among multiple users. The Upper 6 GHz band presents an opportunity to demonstrate how modern spectrum management can maximize utilization through dynamic sharing rather than static, exclusive assignments. Where mobile services are not deployed, there is significant value in enabling continued access to the spectrum by licence-exempt Wi-Fi systems. A simple geolocation-based approach provides an effective means of achieving this objective. By using device location information in combina-

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	tion with a database identifying areas where mobile services are authorized or deployed, Wi-Fi devices can readily determine when the Upper 6 GHz spectrum is available for use and when access should be restricted. This ensures that spectrum is available to Wi-Fi where and when it is not required for mobile services, maximizing the value of this national resource while fully protecting mobile operations. More broadly, extensive technical studies conducted in the UK, Europe, and internationally have consistently demonstrated that Low Power Indoor (LPI) Wi-Fi can successfully coexist with incumbent services operating in the 6 GHz band while meeting the applicable protection criteria. These studies have considered sharing with fixed services, fixed satellite services, mobile services, radio astronomy, and other incumbent users under realistic deployment assumptions. As reflected in the technical record developed by Ofcom, CEPT, the FCC, and other administrations, appropriately regulated low-power Wi-Fi operations do not cause harmful interference to incumbent services. Wi-Fi Alliance therefore encourages Ofcom to continue applying coexistence measures that are technically justified, proportionate, and based on established engineering analyses. Protection requirements should be no more restrictive than necessary to ensure the continued operation of incumbent services, while allowing spectrum to be used efficiently whenever and wherever it is available. As demand for wireless connectivity continues to grow, dynamic spectrum-sharing approaches such as those proposed by Ofcom provide an effective model for balancing the needs of multiple services. By enabling Wi-Fi access in areas where mobile services are not operating, while maintaining appropriate protections for incumbents and future mobile deployments, Ofcom can maximize consumer benefits, promote innovation, and ensure the Upper 6 GHz band is used to its fullest potential.

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Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	Confidential? –N Wi-Fi Alliance supports Ofcom's objective of maximizing efficient spectrum use while enabling future mobile deployment. We encourage Ofcom to recognize the substantial economic and societal benefits delivered by licence-exempt wireless technologies, including Wi-Fi, which underpin residential broadband, enterprise connectivity, industrial digitalization, healthcare, education, transportation, and public services. Maintaining opportunities for efficient spectrum sharing wherever technically feasible will help maximize the overall value generated by the Upper 6 GHz band for UK consumers, businesses, and the wider economy. We therefore support approaches that avoid leaving spectrum unnecessarily unused prior to commercial mobile deployment and that continue to encourage efficient sharing wherever possible.
Question 8: Do you have any comments on our Equality impact assessment?	Wi-Fi Alliance has no comments.
Question 9: Do you have any comments on our Welsh Language impact assessment?	Wi-Fi Alliance has no comments.